

EPA Registration No.
82957-3
vol. 1



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs

Registration Division (H7505C)

401 "M" St., S.W.

Washington, D.C. 20460

EPA Reg.

Number:

82957-3

Date of Issuance:

Term of Issuance: **Conditional**

Name of Pesticide Product:

Turfthor WP

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Mr. Michael Kellogg
Ensystex III, Inc.
c/o Pyxis Regulatory Consulting, Inc.
4110 136th St. NW
Gig Harbor, WA 98332

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A). Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

1. Revise the EPA Registration Number to read, EPA Reg. No. "82957-3".

Signature of Approving Official:

Dani Daniel
Insecticide-Rodenticide Branch
Registration Division (7505P)

Date:

NOV 2 2006

1. Rewrite the "Hazards to Humans and Domestic Animals" statement to read as follows: Harmful if swallowed, inhaled, or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes, or clothing. Avoid breathing dust or vapor. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco. Keep children and pets off treated area until spray is dry.

2. Complete the glove statement under the "Personal Protective Equipment" statement use the Agency language as follows: **Chemical resistant gloves made of any waterproof material such as barrier laminate, butyl rubber, nitrile rubber, neoprene rubber, natural rubber, polyethylene, polyvinylchloride (PVC) or viton.**

3. Make the following changes to the warranty statement:

Conditions: In the first sentence, change the word "**should**" to the word "**must**".

Disclaimer of Warranties: Begin the first sentence to read: "**To the extent consistent with applicable laws...**"

Limitations of Liability: Rewrite the first sentence to read: **To the extent consistent with applicable law...**

4. Submit a required one year storage stability (830.6317) study for the proposed product under warehouse conditions. It is recommended that observations be made at 0, 3, 6, 9 and 12 month intervals. The corrosion characteristics (830.6320) study may be carried out concurrently.

5. Submit two copies of your final printed labeling before you release the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sect. 6(e). Your release for shipment of the product constitute acceptance of these conditions.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice, please contact me at (703) 305-5409.

Enclosure:



TURFTHOR WP

For foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

Keep water soluble packets in outer container until immediately before use. Store in a cool, dry place but not below freezing (32°F).

EPA Reg. No. 82957-X EPA Est. 81824-NC-001

STOP – Read the label before use
KEEP OUT OF REACH OF CHILDREN

CAUTION

PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido explicada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.
Fayetteville, NC 28303

ACCEPTED
with COMMENTS
In EPA Letter Dated:

NOV 2 2006

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
82957-3

FIRST AID

If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, waterproof gloves, shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.04 lbs.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool (but not below freezing (32°F)), dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Exposure to moisture or excessive handling of water soluble packets can cause them to break. Store water soluble packets in original container preferably in a locked area. Do not cut the water soluble packets when opening container.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensyslex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

Each TURFTHOR WP outer container contains a number of clear water soluble packets. Do not allow the packets to become wet at any time before putting them into a spray tank at the time of intended mixing. Handling the packets with wet hands or gloves or in a rough manner can cause them to leak. Reseal the outer container if water soluble packets are left inside after opening.

To mix, open the outer container and remove the required number of unopened packets needed for the gallon amount of solution to be mixed. Drop the required number of packets into the spray tank as it is being filled with water with the agitator operating. The elapsed time until the packets are fully dissolved depends on the degree of agitation and the temperature of the water with more time needed for lower levels of agitation and lower temperatures. Usually, a few minutes is sufficient time for the packets to completely dissolve.

When using TURFTHOR WP packets in tanks also containing products that contain boron or free chlorine. The packet material may react with the boron or chlorine to form a non-water soluble compound instead of dissolving into the water. However chlorinated water use is acceptable and will not cause this compound to form or reaction to occur. Because the packets are soluble in water but not oil, do not attempt to use packets in diesel oil or summer spray oils.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately disperse the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications	
Use Rate	Ounces (Packets) per 1,000 sq. feet
A	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.
B	1.6 ounces (1 packet) per 8,250 sq. ft.

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass ateinius, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications	
	1.6 ounces (1 packet) per 300 gallons of water.

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications	
	1.6 ounces (1 packet) per 8,250 to 11,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees
1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Grid Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the branches/foliage out to the tree's drip line.

Circle Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees
1.6 ounces (1 packet) per 24 to 48 inches of cumulative trunk diameter

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs
1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs
1.6 ounces (1 packet) per 24 to 48 cumulative ft. of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not graze treated areas or use dippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated or frozen.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and should be followed carefully. However, because of manner of use and other factors beyond the control of Ensysyex III, Inc., it is impossible for Ensysyex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensysyex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensysyex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent permitted by law, Ensysyex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

This Conditions of Sale and Limitation of Warranty and Liability may not be amended by any oral or written agreement.

TURFTHOR is a registered trademark of Ensysyex III, Inc.

Revised 12/05



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 2, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: **D-364318**
EPA File Symbol or Registration Number: **82957-G**
Product Name: **TURFTHOR WP**
EPA Receipt Date: 30-Jan-2006
EPA Company Number: 82957
Company Name: ENSYSTECH III, INC.

MICHAEL KELLOGG
PYXIS REGULATORY CONSULTING, INC.
ENSYSTECH III, INC.
4110 136TH ST., NW
GIG HARBOR, WA 98332-

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: **R31**

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT
CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Please remit payment in the amount of: \$ **4,200** to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:
U.S. EPA Washington Finance Center
Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

By Courier:
Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 S. Bell St.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,


Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service



This package includes the following

☒ New Registration

☐ Amendment

☒ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr.

1

Receipt No.

S-

789614

EPA File Symbol/Reg. No.

82957-G

Pin-Punch Date:

1/30/06

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

R31

Granted:

R31

Amount Due: \$

4,200

Parent/Child Decisions:

Reviewer:



Date:

2-1-06

Remarks:

Receipt for Section 3

S: 789614

Registration: ☒ Yes ☐ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☒ Yes ☐ No

Application Type: New Registration

Billable: ☒ Yes ☐ No

Company: 82957 ENSYSTEX II, INC.

V

Risk Manager: Registration Division, Risk Management Team 1

Product #: 82957-G Product Name: TURFTHOR WP

Overseed:

Me Too Section3: Me Too Product Name:

Application Date: 24-Jan-2006

OPP Rec'd Date: 30-Jan-2006

Front End Date: 30-Jan-2006

Risk Manager Send Date: 02-Feb-2006

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

New product, non-fast track. 2/2/06, R31 Invoice (LWV).

New Ingredient Request Date:

New Ingredient Received Date:

Form A: ☐ Signature Date:

Form B: ☐ Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Study

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

January 24, 2006

COURIER DELIVERY

Dan Kenny (PM 1)
Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202

RE: Ensystex III, Inc. – Turfthor WP (EPA Reg. No. 82957-)
Application for New Pesticide Registration

Dear Mr. Kenny,

On behalf of Ensystex III, Inc. please find the enclosed application for registration of Turfthor WP, an end-use product containing imidacloprid as the active ingredient. Turfthor WP is a wettable powder that will be packaged in water-soluble packaging (WSP) (individual WSP packets will be packaged inside HDPE plastic bottles) and also as a wettable powder (non-WSP) packaged in HDPE plastic bottles. Ensystex III, Inc. is enclosing labels that reflect directions for use for product packaged as a powder (non-WSP), and a label reflecting directions for use for product packaged in water-soluble packaging.

In support of this application, we submit the following documents:

1. Application for a New Pesticide Registration (EPA Form 8570-1)
2. Confidential Statement of Formula (Basic and Alternate formulation dated January 23, 2006)
3. Five (5) Copies of the Proposed Labeling (Non-WSP label)
4. Five (5) Copies of the Proposed Labeling (WSP label)
5. Agency Internal Use Copy of the Data Matrix
6. Public File Copy of the Data Matrix
7. Copies of notice of intent to apply sent to companies identified on the Data Submitter's List
8. Agency letters to water-soluble packaging (WSP) and ink suppliers approving products for use in pesticide formulations
9. Letter of Authorization
10. Product Specific Data:

Volume 1	830.1550, 830.1600, 830.1650, 830.1670, 830.1750, 830.1800	Kellogg, M. Product Identity and Composition, Description of the Materials Used, Description of the Formulation Process, Discussion of the Formation of Impurities, Certified Limits, and Analytical Methods to Verify Certified Limits for Turfthor WP.
Volume 2	830.1800	Vohra, Y. Validation of Analytical Method for Active Ingredient Analysis of Imidathor 75 WP by HPLC.

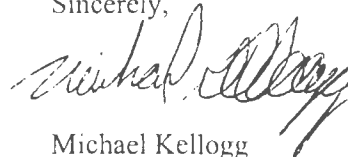
Volume 3	830.6303	Suratwala, T. Physical State of Imidathor 75 WP.
Volume 4	830.6314	Suratwala, T. Oxidation/Reduction Properties of Imidathor 75 WP.
Volume 5	830.7000	Suratwala, T. pH of Imidathor 75 WP.
Volume 6	830.7300	Suratwala, T. Tap Density of Imidathor 75 WP.
Volume 7	830.6302, 830.6304, 830.6313, 830.6315, 830.6316, 830.6319, 830.6321, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550- 830.7570, 830.7840- 830.7860, 830.7950	Kellogg, M. Waiver Request for Certain Data Requirements for Turfthor WP.
Volume 8	870.1100	Vichare, A. Acute Oral Toxicity Study of Imidathor 75 WP in Rats.
Volume 9	870.1200	Vichare, A. Acute Dermal Toxicity Study of Imidathor 75 WP in Rats.
Volume 10	870.1300	Wable, R. Acute Inhalation Toxicity Study of Imidathor 75 WP In Rats.
Volume 11	870.2400	Vichare, A. Acute Eye Irritation Study of Imidathor 75 WP In Rabbits.
Volume 12	870.2500	Vichare, A. Acute Dermal Irritation Study of Imidathor 75 WP In Rabbits.
Volume 13	870.2600	Wable, R. Skin Sensitization Study of Imidathor 75 WP In Guinea Pigs.

Ensysstex III believes this application falls under R31 (86: New-product, non-fast track) because it is an application for registration using a currently unregistered source of imidacloprid technical [ENS-010, EPA File Symbol No. 82957-R; Please note: application for registration of ENS-010 has been placed in Category R32] and product chemistry and acute toxicity data are being submitted to support this application.

Ensysstex III is currently finalizing its packaging details for Turfthor WP. Ensysstex III recognizes that Turfthor WP triggers Child Resistant Packaging requirements and it will submit the CRP certification when the packaging details are finalized. Ensysstex III requests that the Agency not delay processing of the application pending submission of the CRP certification.

We trust you will find this application complete. However, please feel free to contact me if you have any questions or need any additional information.

Sincerely,



Michael Kellogg

Enclosures

cc: David Nimocks; Ensysstex III, Inc.



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 82957- <u>4</u>	2. EPA Product Manager D. Kenny	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Ensystex III, Inc. / Turfthor WP	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Ensystex III, Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136th St. NW Gig Harbor, WA 98332 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. <u>432-1314</u> Product Name <u>Merit 75 WP</u>	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input checked="" type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application falls under Category R31 (86: New product, non-fast track) because it is an application for registration using a currently unregistered source of imidacloprid technical (ENS-010, EPA File Symbol No. 82957-R) and product chemistry and acute toxicity data are being submitted to support this application. The fee due is \$4200 and the decision timeline is 6 months. Please email or fax the fee for service invoice to: fees@PyxisRC.com or 253-853-5516.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal	
<input checked="" type="checkbox"/> Notification must be submitted	If "Yes" Unit Packaging wgt. _____ No. per container _____	If "Yes" Package wgt. _____ No. per container _____		<input checked="" type="checkbox"/> Plastic	
	see attached	see attached		<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) <u>see attached</u>	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container see attached		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Michael Kellogg	Title Agent	Telephone No. (Include Area Code) 253-853-7369
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamp)
2. Signature 	3. Title Agent	
4. Typed Name Michael Kellogg	5. Date 1/24/06	

Application for Registration (cont'd)

RE: Turfthor WP

Section III

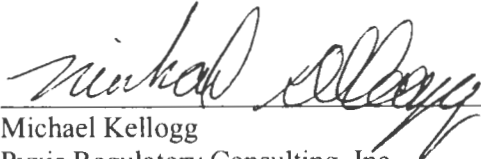
Turfthor WP will be packaged in Water Soluble Packaging (WSP) and HDPE plastic bottles

Water Soluble Packaging (WSP):

1.6 oz. (4, 16, or 88 per container) – water-soluble packets will be contained within HDPE plastic bottles.

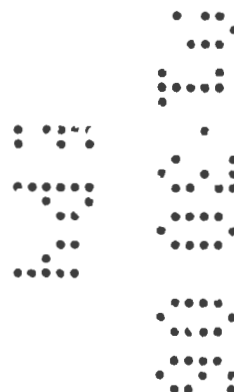
Plastic Container Packaging (Non-WSP):

Ensystex III, Inc. may also package Turfthor WP in 16 oz. and 32 oz. HDPE plastic bottles.



Michael Kellogg
Pyxis Regulatory Consulting, Inc.

11/24/06
Date





TURFTHOR WP

foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

EPA Reg. No. 82957-X EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido dada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303

843

30.02.10

FIRST AID

If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, waterproof gloves, shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.04 lbs.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

To mix, measure out the required amount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications	
Use Rate	Ounces per acre / Teaspoons per 1,000 sq. feet
A	6.4⇒8.6 ounces per acre / 3⇒4 level teaspoons per 1,000 sq. ft.
B	8.6 ounces per acre / 4 level teaspoons per 1,000 sq. ft.

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black grass stem borer, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Teaspoons TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

To mix and apply any amount of TURFTHOR WP for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable TURFTHOR WP Use Rate (ounces per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Ounces TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications	
Gallons Water	Level Teaspoons TURFTHOR WP
2.5	0.25
5.0	0.50
10.0	1.00
25.0	2.50
50.0	5.00
100.0	10.00

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications
6.4⇒8.6 ounces per acre / 3⇒4 level teaspoons per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been used before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) /
1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) /
1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height /
1 to 2 ounces per 30 cumulative feet of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height /
1 to 2 ounces per 30 cumulative feet of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated or frozen.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

CONDITIONS OF SALE: The Directions for Use of this product are believed to be adequate and should be followed carefully. However, because of manner of use and other factors beyond the control of Ensysyex III, Inc., it is impossible for Ensysyex III to eliminate all risks associated with the use of this product such as ineffectiveness or unintended consequences. All such risks shall be assumed by Buyer and User, and Buyer and User agree to hold Ensysyex III harmless for any claims relating to such factors.

DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensysyex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent permitted by law, Ensysyex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

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TURFTHOR is a registered trademark of Ensysyex III, Inc.

Revised 12/05



TURFTHOR WP

foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

EPA Reg. No. 82957-X EPA Est. 81824-NC-001

STOP – Read the label before use

KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender inglés, no use este producto hasta que la etiqueta le haya sido dada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303



FIRST AID

If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, waterproof gloves, shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.04 lbs.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact EnsysTex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

To mix, measure out the required amount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications	
Use Rate	Ounces per acre / Teaspoons per 1,000 sq. feet
A	6.4→8.6 ounces per acre / 3→4 level teaspoons per 1,000 sq. ft.
B	8.6 ounces per acre / 4 level teaspoons per 1,000 sq. ft.

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Turf Pests Grouped by Use Rates

Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black grass alateus, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Teaspoons TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

To mix and apply any amount of TURFTHOR WP for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable TURFTHOR WP Use Rate (ounces per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Ounces TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / sticker.

Ornamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications	
Gallons Water	Level Teaspoons TURFTHOR WP
2.5	0.25
5.0	0.50
10.0	1.00
25.0	2.50
50.0	5.00
100.0	10.00

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications
6.4→8.6 ounces per acre / 3→4 level teaspoons per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) /
1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) /
1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height /
1 to 2 ounces per 30 cumulative feet of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height /
1 to 2 ounces per 30 cumulative feet of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

IMPORTANT READ BEFORE USE

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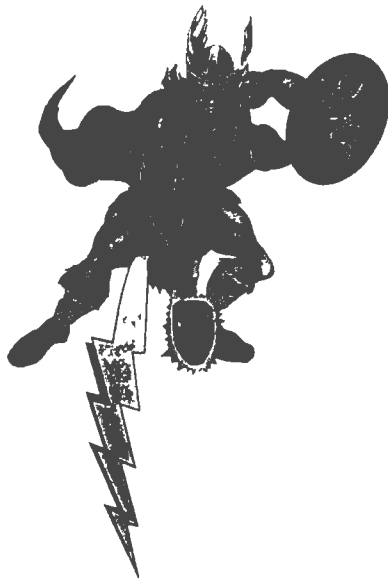
DISCLAIMER OF WARRANTIES: Seller warrants that this product conforms to the chemical description on the label and is reasonably fit for the purposes stated on the Directions for Use when used in accordance with the Directions for Use under normal conditions of use. ENSYSTEX III MAKES NO WARRANTIES OF MERCHANTABILITY OR OF FITNESS FOR A PARTICULAR PURPOSE, NOR ANY OTHER EXPRESS OR IMPLIED WARRANTIES WITH RESPECT TO THE SELECTION, PURCHASE, OR USE OF THIS PRODUCT THAT EXTEND BEYOND THE STATEMENTS MADE ON THIS LABEL. Any warranties, express or implied, having been made are inapplicable if this product has been used contrary to label instructions, under abnormal conditions or under conditions not reasonably foreseeable by (or beyond the control of) seller or Ensysyex III, Inc., and buyer assumes the risk of any such use.

LIMITATIONS OF LIABILITY: To the extent permitted by law, Ensysyex III shall not be liable for any incidental, consequential or special damages resulting from the use or handling of this product. THE EXCLUSIVE REMEDY OF THE USER OR BUYER, AND THE EXCLUSIVE LIABILITY OF ENSYSTEX III AND SELLER FOR ANY AND ALL CLAIMS, LOSSES, INJURIES OR DAMAGES (INCLUDING CLAIMS BASED ON BREACH OF WARRANTY, CONTRACT, NEGLIGENCE, TORT, STRICT LIABILITY OR OTHERWISE) RESULTING FROM THE USE OR HANDLING OF THIS PRODUCT, SHALL BE THE RETURN OF THE PURCHASE PRICE OF THE PRODUCT OR, AT THE ELECTION OF ENSYSTEX III, THE REPLACEMENT OF THE PRODUCT.

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Revised 12/05



TURFTHOR WP

foliar and systemic control of insect pests of turfgrass, landscape ornamentals, shrubs and trees in lawns, golf courses, landscapes, playgrounds, parks, athletic fields and interior plantscapes.

Active Ingredient:	By Wt.
Imidacloprid	75.0%
Other Ingredients:	25.0%
TOTAL:	100.0%

EPA Reg. No. 82957-X EPA Est. 81824-NC-001

STOP – Read the label before use
KEEP OUT OF REACH OF CHILDREN

CAUTION

(PRECAUCION AL USUARIO: Si usted no puede leer o entender ingles, no use este producto hasta que la etiqueta le haya sido dada ampliamente.)

(TO THE USER: If you cannot read and understand English, do not use this product until the label has been fully explained to you.)

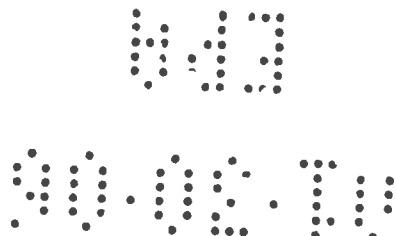
For product use information call 1-866-FOR-THOR (367-8467) or visit www.for-thor.com.

NET WEIGHT: As marked on container

Manufactured by:

ENSYSTEX III, Inc.

Fayetteville, NC 28303



FIRST AID

If swallowed	<ul style="list-style-type: none"> • Call poison control center or doctor immediately for treatment advice. • Have person sip a glass of water if able to swallow. • Do not induce vomiting unless told to do so by the poison control center or doctor. • Do not give anything to an unconscious person.
If on skin or clothing	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 to 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15 to 20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.

HOTLINE NUMBER

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-(866)-367-8467 for emergency medical treatment information.

NOTE TO PHYSICIAN

No specific antidote is available. Treat the patient symptomatically.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

CAUTION

Harmful if swallowed, inhaled or absorbed through skin. Causes eye irritation. Avoid contact with skin, eyes or clothing. Avoid breathing dust or vapor. Keep children and pets off treated areas until spray is dry.

Personal Protective Equipment: Applicators and other handlers must wear long-sleeved shirt and long pants, waterproof gloves, shoes plus socks (PPE). Follow manufacturer's instructions for cleaning/maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

User Safety Recommendations: Wash hands before eating, drinking, chewing gum, using tobacco or using the toilet. Remove clothing immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing. Remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Environmental Hazards

This pesticide is highly toxic to aquatic invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwaters.

This product is highly toxic to bees exposed to direct treatment or residues on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds if bees are visiting the treatment area.

The properties and characteristics of this chemical are similar to those of agrochemicals that have been detected in groundwater. Using this chemical in areas where the soil is permeable, and particularly where the water table is shallow (close to the ground surface), may result in contamination of the surrounding groundwater.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling. Consult your State or Tribe for requirements specific to that jurisdiction.

Do not apply more than 8.6 ounces (0.04 lbs.) of TURFTHOR WP per acre per year for any type(s) or combination(s) of applications.

Do not apply in greenhouses or nurseries.

Not for use on sod farm turf or grass grown for commercial seed production.

Not for use on bearing fruit or nut trees.

Do not apply through an irrigation system.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Keep out of reach of children and animals. Store in original containers only. Store in a cool, dry place and avoid excess heat. Handle and open container in a manner so as to prevent spillage. Do not put concentrate or dilute material into food or drink containers. Preferably store in a locked area.

Pesticide Disposal: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

Container Disposal: Triple rinse (or equivalent). Then offer for recycling or reconditioning, or puncture and dispose of in a sanitary landfill or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

In Case of Spill: Confine it, avoid contact, isolate area and keep animals and unprotected persons away. If spill is liquid, form dike around spill area and/or absorb spill with absorbent materials, such as sand, cat litter or clay. If spill is dry powder only, sweep material into a suitable container. Place damaged package in a holding container and identify contents. Contact Ensystex III at 1-866-367-8467 or Chemtrec at 1-800-424-9300 for any assistance.

DILUTION AND MIXING OF TURFTHOR WP

To mix, measure out the required amount of TURFTHOR WP. Pour this amount of TURFTHOR WP into the spray tank as it is being filled with water with the agitator operating.

APPLICATION FOR TURF PESTS

TURFTHOR WP controls or suppresses a wide range of soil inhabiting turfgrass insect pests. TURFTHOR WP is not for use on turfgrass grown for sale (sod farms), commercial seed production or for research.

Application Sites

Permitted sites include but are not limited to lawns, grounds and landscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks.

Application Timing

The active ingredient in TURFTHOR WP, imidacloprid, has sufficiently long-lasting residual activity that applications can be made prior to egg laying by the target pest(s). Optimum control of turf pests will be achieved when application is made prior to egg hatch followed by sufficient irrigation or rainfall to move the active ingredient through the thatch and down into the underlying soil. Applications can be timed based on past experiences at the site or in the area, current results of adult monitoring/trapping or other methods.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Post Application Watering and Mowing

Optimum control is achieved if irrigation or rainfall occurs within 24 hours after application. Uniformity of application may be adversely affected if turf is mowed prior to irrigation/rainfall occurring.

Application Precautions and Preparations

Keep children and pets off treated areas until spray has dried.

Application should not be made to turf that is frozen, waterlogged or is saturated with water. Turf in this condition will not allow the necessary vertical distribution of the active ingredient down into the soil.

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

Application Equipment and Methods

Apply the indicated amount TURFTHOR WP mixed in a volume of water sufficient to adequately distribute the active ingredient to the target area(s). Apply TURFTHOR WP solution as a spray of uniform, coarse droplets at a pressure low enough to eliminate drift from the target area. Properly calibrated application equipment must be used to apply TURFTHOR WP.

Turf Application Use Rates

Use Rate Table for TURFTHOR WP for Turf Applications	
Use Rate	Ounces per acre / Teaspoons per 1,000 sq. feet
A	6.4→8.6 ounces per acre / 3→4 level teaspoons per 1,000 sq. ft.
B	8.6 ounces per acre / 4 level teaspoons per 1,000 sq. ft.

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Turf Application Volumes

The calculated amount of TURFTHOR WP can be applied in any volume of water as long as the maximum label rate is not exceeded. Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Pests Grouped by Use Rates

Use Rate A: Larvae of: Annual bluegrass weevil, Asiatic garden beetle, Billbug, Black turfgrass attenuatus, Cutworms (suppression only), European chafer, European Crane Fly, Green June beetle, Japanese beetle, Northern masked chafer, Oriental beetle, *Phyllophaga* spp., Southern masked chafer

Use Rate B: Chinch bug (suppression only), Mole Crickets

Application Recommendations Against Specific Turf Pests

Grubs, billbugs, annual bluegrass weevil and European crane fly: Optimum control is obtained when application is made prior to egg hatch.

Chinch bugs: To maximize suppression, make application prior to the hatch of the first instar nymphs.

Mole crickets: Make application prior to or during the period of peak egg hatch. Apply an adulticide in conjunction with TURFTHOR WP if adults or large nymphs are present and tunneling at the time of application.

Calculating Amounts of TURFTHOR WP to Mix for Turf Pests

To mix and apply any amount of TURFTHOR WP for turf pests based on number of square feet, determine:

A = # of Square feet of area to be treated / 1000 (for example 5,500 sq. ft. / 1000 = 5.5)

B = Applicable TURFTHOR WP Use Rate (teaspoons per 1000 square feet) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Teaspoons TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

To mix and apply any amount of TURFTHOR WP for turf pests based on number of acres, determine:

A = # of acres of area to be treated = square feet of area to be treated / 43,560 (1 acre = 43,560 sq. ft.)

B = Applicable TURFTHOR WP Use Rate (ounces per acre) for the target pest(s) from the Use Rate Table. If treating for more than one type of pest, select the highest rate.

Calculate the amount of TURFTHOR WP to mix for turf pests as follows:

Ounces TURFTHOR WP to use = A X B

Mix this amount of TURFTHOR WP in the amount of water needed to make the application.

FOLIAR AND BROADCAST APPLICATION FOR ORNAMENTAL PESTS

TURFTHOR WP, applied to foliage and broadcast on the soil, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up into the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Foliar Application

Foliar application of TURFTHOR WP offers local systemic activity against insect pests. Applications to plants with hard to wet foliage such as holly, pine or ivy should be applied in combination with a spreader / slicker.

Ornamental Application to Control Ants

TURFTHOR WP can be used to indirectly control ants when applied to control aphids, scale insects, mealybugs and other sucking insects on ornamentals thereby limiting the amount of honeydew available.

Foliar Application Volumes and Application Methods

Establish quantity of water necessary to uniformly wet foliage. Mix required amount of TURFTHOR WP (from the table below) in that quantity of water. Begin treatments prior to establishment of high pest populations. Reapply as needed.

Mixing Table for TURFTHOR WP for Foliar Applications	
Gallons Water	Level Teaspoons TURFTHOR WP
2.5	0.25
5.0	0.50
10.0	1.00
25.0	2.50
50.0	5.00
100.0	10.00

1 level teaspoon TURFTHOR WP = 1.4 grams TURFTHOR WP

3 level teaspoons = 1 tablespoon

Ornamental Pests Controlled by Foliar Application

Adelgids, Aphids, Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Mealybugs, Psyllids, Sawfly larvae, Thrips (suppression), Whiteflies.

Broadcast Application

Broadcast Application Use Rate

Use Rate Table for TURFTHOR WP for Broadcast Applications
6.4→8.6 ounces per acre / 3→4 level teaspoons per 1,000 sq. ft.

Broadcast Application Volume and Application Method

Mix required amount of product in a quantity of water sufficient to uniformly treat area. Use a minimum of 2 gallons of water per 1000 square feet. To achieve optimum control, irrigate treated area in order to incorporate treatment into upper level of soil. May be applied and incorporated into flowerbed soil before planting.

Do not exceed the maximum label rate by applying solution to an area smaller than intended when it was mixed and diluted unless such under dosing will not result in an application rate in excess of the maximum label rate.

Ornamental Pests Controlled by Broadcast Application

White grub larvae such as Japanese beetle larvae, Chafers, *Phyllophaga* spp., Asiatic garden beetle, Oriental beetle

SOIL INJECTION AND SOIL DRENCH FOR ORNAMENTAL PESTS

TURFTHOR WP, applied as a soil drench or soil injection, controls a wide range of insects on trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, foliage plants, ground covers and interior plantscapes. Non-bearing trees are perennial plants that will not produce a harvestable agricultural commodity within the next 12 months. TURFTHOR WP is not for use on plants being grown for sale, fruit, nut or commercial seed production or for research purposes.

TURFTHOR WP is a systemic insecticide meaning it will be translocated by the plant's vascular system from the roots up to the body of the plant. This means optimum effectiveness of TURFTHOR WP is realized when TURFTHOR WP is applied on or near a growing portion of the plant from which it can be translocated to other parts of the plant. Combining TURFTHOR WP with a nitrogen containing fertilizer may accelerate or otherwise enhance the uptake of the active ingredient into the plant.

Translocation of soil directed applications made to woody stemmed plants can be delayed by up to 60 days. Optimum levels of control are realized when applications are performed sufficiently prior to anticipated pest infestations.

Applications to trees for the control of existing borer infestations may not prevent the eventual loss of the tree due to existing damage already caused by the pest and stress to the tree caused by the pest infestation.

Application Sites

For use on ornamental plants including but not limited to trees (including non-bearing fruit and nut trees), shrubs, evergreens, flowers, ground covers, bedding plants and foliage plants. Permitted sites include but are not limited to landscapes, forests (public and private), ornamental gardens, parks, lawns, grounds, golf courses and interior plantscapes at and/or around residences including multi-unit, commercial, office and shopping buildings and complexes, recreational areas, playgrounds, athletic fields, golf courses, cemeteries, airports and parks, public and private wooded and forested areas.

Application Preparation

TURFTHOR WP can be mixed with other insecticides, miticides, fungicides and fertilizers. Follow the label directions of all the products mixed, making sure not to exceed the labeled application rate of any individual product in the mixture. Any tank mixture that has not been tested before should be tested before full scale use by first mixing a small quantity of the mixture to ensure there is no physical or chemical incompatibility.

If necessary, consult resources in horticulture in your area (such as your Cooperative Extension Service) to determine appropriate application timing.

Ornamental Pests Controlled by Soil Injection or Drench Application

Adelgids, Aphids, Armored scales (suppression), Black vine weevil larvae, Emerald ash borer, Eucalyptus longhorned borer, Flatheaded borers (including bronze birch borer and alder borer), Japanese beetles, Lace bugs, Leaf beetles (including elm and viburnum leaf beetles), Leafhoppers (including glassy-winged sharpshooter), Leaf miners, Mealybugs, Pine tip moth larvae, Psyllids, Royal palm bugs, Sawfly larvae, Soft scales, Thrips (suppression only), White grub larvae, Whiteflies.

Soil Injection for Trees

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Injection for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) /

1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)

Soil Injection Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure according to one of the two following methods. Make a minimum of 4 injection holes per tree. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Injection: Evenly space holes on 2.5 foot centers in a grid pattern in the soil beneath the branches/foliage out to the tree's drip line.

Basal Injection: Evenly space injection holes around the base of the tree no more than 12 inches out from the tree.

Soil Drench for Trees

Soil Drench Use Rate for Trees

Use Rate Table for TURFTHOR WP for Soil Drench for Trees

0.7 to 1.4 level teaspoons per inch of trunk diameter (DBH) /

1 to 2 ounces per 30 cumulative inches of trunk diameter (DBH)

Soil Drench Volume and Application Method for Trees

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the tree. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

Soil Injection for Shrubs

Soil Injection is not allowed in Nassau and Suffolk Counties of New York

Soil Injection Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Injection for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height /

1 to 2 ounces per 30 cumulative feet of shrub height

Soil Injection Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the treatment to be adequately dispersed. Apply at a low pressure making a minimum of 4 injection holes per shrub. For optimum control, maintain a high level of soil moisture in the treated area for 7 to 10 days after treatment.

Soil Drench for Shrubs

Soil Drench Use Rate for Shrubs

Use Rate Table for TURFTHOR WP for Soil Drench for Shrubs

0.7 to 1.4 level teaspoons TURFTHOR WP per foot of shrub height /

1 to 2 ounces per 30 cumulative feet of shrub height

Soil Drench Volume and Application Method for Shrubs

Mix the calculated amount of TURFTHOR WP in the amount of water determined to be adequate for the solution to be adequately dispersed. Apply solution at a rate of no less than 10 gallons per 1000 square feet around the base of the shrub. If present, remove any barrier to the movement of the solution into the soil such as a plastic vapor barrier.

ATTENTION

Do not graze treated areas or use clippings from treated areas for feed or forage.

Avoid runoff or puddling of irrigation water following application.

Avoid application to areas in which penetration to the root zone is unlikely to occur such as areas that are waterlogged, saturated for frozen.

IMPORTANT READ BEFORE USE

NOTICE: Read the entire Directions for Use, Conditions of Sale, Disclaimer of Warranties and Limitations of Liability before buying or using this product. If the terms are not acceptable, return the product at once, unopened, and the purchase price will be refunded.

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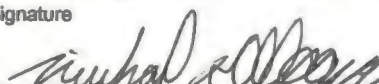
Revised 12/05

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DATA MATRIX

Date January 24, 2006			EPA Reg No./File Symbol 82957-	Page 7 of 13	
Applicant's/Registrant's Name & Address Ensystex III, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Turfthor WP		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Product Specific Data Requirements – Product Chemistry					
830.1550	Product Identity and Composition	Volume 1	Ensystex III, Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	Volume 1	Ensystex III, Inc.	OWN	
830.1620	Description of Production Process				Not required ¹
830.1650	Description of Formulation Process	Volume 1	Ensystex III, Inc.	OWN	
830.1670	Discussion of Formation of Impurities	Volume 1	Ensystex III, Inc.	OWN	
830.1700	Preliminary Analysis				Not required ²
830.1750	Certified Limits	Volume 1	Ensystex III, Inc.	OWN	
830.1800	Enforcement Analytical Method	Volume 1 Volume 2	Ensystex III, Inc. Ensystex III, Inc.	OWN OWN	
830.6302	Color				Not required ³
830.6303	Physical State	Volume 3	Ensystex III, Inc.	OWN	
830.6304	Odor				Not required ³
830.6313	Stability to Normal and Elevated Temperatures, Metals, and Metal Ions				Not required ³
830.6314	Oxidation/Reduction: Chemical Incompatibility	Volume 4	Ensystex III, Inc.	OWN	
830.6315	Flammability				Not required ⁴
Signature 			Name and Title Michael Kellogg, Consultant		Date 1/24/06

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Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6316	Explodability				Not required ⁵
830.6317	Storage Stability				PRN 92-5 ⁶
830.6319	Miscibility				Not required ⁷
830.6320	Corrosion Characteristics				See endnote ⁶
830.6321	Dielectric Breakdown Voltage				Not required ⁸
830.7000	pH	Volume 5	Ensysyex III, Inc.	OWN	
830.7050	UV/Visible Absorption				Not required ³
830.7100	Viscosity				Not required ⁹
830.7200	Melting Point/Melting Range				Not required ³
830.7220	Boiling Point/Boiling Range				Not required ³
830.7300	Density/Relative Density/Bulk Density	Volume 6	Ensysyex III, Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required ³
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method				Not required ³
830.7560	Partition Coefficient (n-octanol/water), Generator Column Method				Not required ³
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				Not required ³
Signature 			Name and Title Michael Kellogg, Consultant		Date 1/24/06

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Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7840	Water Solubility: Column Elution Method; Shake Flask Method				Not required ³
830.7860	Water Solubility, Generator Column Method				Not required ³
830.7950	Vapor Pressure				Not required ³
Product Specific Data Requirements – Acute Toxicity					
870.1100	Acute Oral Toxicity: Rat	Volume 8	Ensysstex III, Inc.	OWN	
870.1200	Acute Dermal Toxicity: Rat	Volume 9	Ensysstex III, Inc.	OWN	
870.1300	Acute Inhalation Toxicity: Rat	Volume 10	Ensysstex III, Inc.	OWN	
870.2400	Primary Eye Irritation: Rabbit	Volume 11	Ensysstex III, Inc.	OWN	
870.2500	Primary Dermal Irritation	Volume 12	Ensysstex III, Inc.	OWN	
870.2600	Dermal Sensitization	Volume 13	Ensysstex III, Inc.	OWN	
Imidacloprid Generic Data Requirements					
Ecotoxicity Data Requirements					
71-1(a)	Acute Avian Oral Toxicity: Quail or Duck	42055308	Bayer Corp	PAY	See endnote ¹⁰
71-2(a)	Acute Avian Dietary Toxicity: Quail	42055310	Bayer Corp	PAY	See endnote ¹¹
Signature 			Name and Title Michael Kellogg, Consultant		Date 1/24/06


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Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
71-2(b)	Acute Avian Dietary Toxicity: Duck	42055311	Bayer Corp	PAY	See endnote ¹²
71-3	Wild Mammal Toxicity				Not required ¹³
71-4(a)	Avian Reproductive Toxicity: Quail	Cite-All		PAY	
71-4(b)	Avian Reproductive Toxicity: Duck	43466501 43466502	Bayer Corp Bayer Corp	PAY PAY	See endnote ¹⁴
72-1(a),(b)	Fish Toxicity: Bluegill	Cite-All		PAY	
72-1(c),(d)	Fish Toxicity: Trout	42055315	Bayer Corp	PAY	See endnote ¹⁵
72-2(a)(b)	Freshwater Invertebrate Toxicity	42055317	Bayer Corp	PAY	See endnote ¹⁶
72-3(a)	Estuarine/Marine Fish Toxicity	Cite-All		PAY	
72-3(b)	Estuarine/Marine Mollusk Toxicity	Cite-All		PAY	
72-3(c)	Estuarine/Marine Shrimp Toxicity	Cite-All		PAY	
72-4(a)	Early Life Stage: Fish				Not required ¹⁷
72-4(b)	Early Life Stage: Aquatic Invertebrate				Not required ¹⁸
72-5	Life Cycle Fish				Not required ¹⁹
Toxicity Data Requirements					
Signature 			Name and Title Michael Kellogg, Consultant		Date 1/24/06

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Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3050 (N/A)	Repeated Dose 28-Day Oral Toxicity Study in Rodents				See 870.4200 ²⁰
870.3100 (82-1(a))	90-Day Oral Toxicity in Rodents				See 870.4200 ²¹
870.3150 (82-1(b))	90-Day Oral Toxicity in Non-Rodents				See 870.4100 ²²
870.3200 (82-2)	21-Day Dermal Toxicity	Cite-All		PAY	
870.3250 (82-3)	90-Day Dermal Toxicity				Not required ²³
870.3465 (82-4)	90-Day Inhalation Toxicity				Not required ²⁴
870.3550 (N/A)	Reproduction/Development Toxicity Screening Test				See 830.3700 and 870.3800
870.3700 (83-3)	Prenatal Development Toxicity Studies	Cite-All		PAY	
870.3800 (83-4)	Reproduction and Fertility Effects				Not required ²⁵
870.4100 (83-1(a))	Chronic Toxicity Rat				See 870.4300
870.4100 (83-1(b))	Chronic Toxicity Dog	Cite-All		PAY	
870.4200 (83-2(a))	Carcinogenicity Rat				See 870.4300
870.4200 (83-2(b))	Carcinogenicity Mouse	Cite-All		PAY	
870.4300 (83-5)	Combined Chronic Toxicity/Carcinogenicity	Cite-All		PAY	
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Date January 24, 2006			EPA Reg No./File Symbol 82957-	Page 6 of 13	
Applicant's/Registrant's Name & Address Ensystex III, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Turftor WP		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.5100 (84-2(a))	Bacterial Reverse Mutation Test	42256341 42256363	Bayer Corp Bayer Corp	PAY PAY	See endnote ²⁶
870.5140 (84-2(a))	Gene Mutation in <i>Aspergillus nidulans</i>				See 870.5100
870.5195 (84-4)	Mouse Biochemical Specific Locus Test				See 870.5100
870.5200 (84-4)	Mouse Visible Specific Locus Test				See 870.5100
870.5250 (84-4)	Gene Mutation in <i>Neurospora crassa</i>				See 870.5100
870.5275 (84-4)	Sex-linked Recessive Lethal Test in <i>Drosophila melanogaster</i>				See 870.5100
870.5300 (84-2(b))	<i>In vitro</i> Mammalian Cell Gene Mutation Test	42256342 42256364 42256365	Bayer Corp Bayer Corp Bayer Corp	PAY PAY PAY	See endnote ²⁷
870.5375 (84-2(b))	<i>In vitro</i> Mammalian Chromosome Aberration Test	42256370 43356371	Bayer Corp Bayer Corp	PAY PAY	See endnote ²⁸
870.5380 (84-2(b))	Mammalian Spermatogonial Chromosome Aberration Test				See 870.5375
870.5385 (84-2(b))	Mammalian Bone Marrow Chromosome Aberration Test	42256344	Bayer Corp	PAY	See endnote ²⁹
870.5395 (84-4)	Mammalian Erythrocyte Micronucleus Test	42256366	Bayer Corp	PAY	See endnote ³⁰
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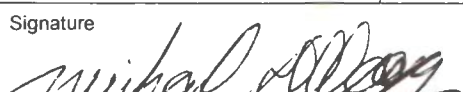
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Applicant's/Registrant's Name & Address Ensysyex III, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Turfthor WP		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.5450 (84-4)	Rodent Dominant Lethal Assay				See 870.5550
870.5460 (84-4)	Rodent Heritable Translocation Assays				See 870.5550
870.5500 (84-2(b))	Bacterial DNA Damage or Repair Tests	42256351	Bayer Corp	PAY	See endnote ³¹
870.5550 (84-4)	Unscheduled DNA Synthesis in Mammalian Cells in Culture	42256352 42256372	Bayer Corp Bayer Corp	PAY PAY	See endnote ³²
870.5575 (84-4)	Mitotic Gene Conversation in <i>Saccharomyces cerevisiae</i>				See 870.5550
870.5900 (84-4)	<i>In vitro</i> Sister Chromatid Exchange Assay	42256349	Bayer Corp	PAY	See endnote ³³
870.5915 (84-4)	<i>In vivo</i> Sister Chromatid Exchange Assay	42256346	Bayer Corp	PAY	See endnote ³⁴
870.6100 (81-7 and 82-5)	Acute and 28-Day Delayed Neurotoxicity of Organophosphorus Substances				Not required ³⁵
870.6200 (81-8 and 82-7)	Neurotoxicity Screening Battery				Not required ³⁶
870.6300 (83-6)	Developmental Neurotoxicity Study				Not required ³⁷
870.6500	Schedule-Controlled Operant Behavior				See 870.6200
870.6850	Peripheral Nerve Function				See 870.6200
870.6855	Neurophysiology; Sensory Evoked Potentials				See 870.6200
870.7200	Companion Animal Safety				Not required ³⁸
870.7485	Metabolism and Pharmacokinetics				Not required ³⁹
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Applicant's/Registrant's Name & Address <div style="text-align: center;"> Ensystem III, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303 </div>			Product <div style="text-align: center;"> Turfthor WP </div>		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.7600 (85-2)	Dermal Penetration				Not required ⁴⁰
870.7800	Immunotoxicity				Not required
870.8355	Combined Chronic Toxicity/Carcinogenicity Testing of Respirable Fibrous Particles				Not required
Plant Protection Data Requirements					
122-1(a)	Tier 1: Seed Germination and Seedling Emergence				Not required ⁴¹
122-1(b)	Tier 1: Vegetative Vigor				Not required ⁴²
122-2	Tier 1: Aquatic Plant Growth				Not required ⁴³
Reentry Exposure Data Requirements					
132-1a	Foliar Residue Dissipation	43923901	Bayer Corp	PAY	See endnote ⁴⁴
133-3	Dermal Passive Dosimetry Exposure	43923901	Bayer Corp	PAY	See endnote ⁴⁵
133-4	Inhalation Passive Dosimetry Exposure	43923901	Bayer Corp	PAY	See endnote ⁴⁶
Nontarget Insect Data Requirements					
141-1	Acute Contact Toxicity: Honey Bee	42273003	Bayer Corp	PAY	See endnote ⁴⁷
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Applicant's/Registrant's Name & Address Ensystem III, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Turthor WP		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
Environmental Fate Data Requirements					
161-1	Hydrolysis	Cite-All		PAY	
161-2	Photodegradation in Water	Cite-All		PAY	
161-3	Photodegradation in Soil	Cite-All		PAY	
162-1	Aerobic Soil Metabolism	42073501	Bayer Corp	PAY	See endnote ⁴⁸
162-2	Anaerobic Soil Metabolism	Cite-All		PAY	
162-3	Anaerobic Aquatic Metabolism				Not required ⁴⁹
162-4	Aerobic Aquatic Metabolism				Not required ⁵⁰
163-1	Leaching and Adsorption/Desorption	42055339 42520801	Bayer Corp Bayer Corp	PAY PAY	See endnote ⁵¹
164-1	Soil Field Dissipation Study				Not Required/See endnote ⁵²
164-2	Aquatic Sediment Field Dissipation Study				Not required ⁵³
164-3	Forest Field Dissipation Study				Not required ⁵⁴
164-5	Long Term Field Dissipation Study				Not required ⁵⁵
165-1	Confined Crop Rotation Study				Not required ⁵⁶
165-3	Accumulation – Irrigated Crops				Not required ⁵⁷
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Applicant's/Registrant's Name & Address Ensystem III, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Turfthor WP		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
165-4	Accumulation in Fish				Waived ⁵⁸
166-1	Small-Scale Prospective Groundwater Study	43449501	Bayer Corp	PAY	Reserved ⁵⁹
166-2	Small-Scale Retrospective Groundwater Study				Reserved ⁶⁰
Residue Chemistry Data Requirements					
860 series					Not required ⁶¹
Ensystem III, Inc. will make offers-to-pay to the following companies on the data submitters list of September 30, 2005					
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Syngenta Crop Protection, Inc.	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Bayer Cropscience LP	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Bayer Environmental Science	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 1/24/06


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Applicant's/Registrant's Name & Address Ensystem III, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Turfthor WP		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Bayer Corp.	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Gustafson, LLC	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Chemical Specialties, Inc.	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Bayer Healthcare LLC	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Mitsui Chemicals America, Inc.	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Lanxess Corporation	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 1/24/06

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Applicant's/Registrant's Name & Address <div align="center"> Ensystex III, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303 </div>			Product <div align="center"> Turfthor WP </div>		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Cite-All under selective method utilized by Ensystex III, Inc. for certain Imidacloprid data requirements		Spray Drift Task Force	PAY	
	Cite-All under selective method utilized by Ensystex III, Inc. for certain Imidacloprid data requirements		Mycogen Seeds	PAY	
	Cite-All under selective method utilized by Ensystex III, Inc. for certain Imidacloprid data requirements		Arbor Systems, LLC	PAY	
	Cite-All under selective method utilized by Ensystex III, Inc. for certain Imidacloprid data requirements		Pet Logic, LLC	PAY	
	Cite-All under selective method utilized by Ensystex III, Inc. for certain Imidacloprid data requirements		Outdoor Residential Exposure Task Force, LLC	PAY	
	Cite-All under selective method utilized by Ensystex III, Inc. for certain Imidacloprid data requirements		Agricultural Reentry Task Force	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 1/24/06


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Applicant's/Registrant's Name & Address Ensystem III, Inc. 2709 Breezewood Avenue Fayetteville, NC 28303			Product Turfthor WP		
Ingredient Imidacloprid					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Bayer Advanced	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Taranaki Nuchem Ltd.	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Arborjet	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Agricultural Handlers Exposure Task Force	PAY	
	Cite-All under selective method utilized by Ensystem III, Inc. for certain Imidacloprid data requirements		Arch Treatment Technologies, Inc.	PAY	
Signature 			Name and Title Michael Kellogg, Consultant		Date 1/24/06

Endnotes for Data Matrix for Turfthor WP

-
- ¹ **830.1620** - Per OPPTS 830.1000, these data are not required for the registration of an end-use product. See 830.1650 for formulation process information.
- ² **830.1700** - This product does not consist solely of the technical grade active ingredient (TGAi) and is not produced by an integrated system, therefore, per OPPTS 830.1700, these data are not required.
- ³ **830.6302, 830.6304, 830.6313, 830.7050, 830.7200, 830.7220, 830.7370, 830.7550, 830.7560, 830.7570, 830.7840, 830.7860 and 830.7950** - Per OPPTS 830.1000, these data are not required for the registration of a end-use product.
- ⁴ **830.6315** - This product is not a combustible liquid; therefore these data are not applicable to this end-use product. Please refer to the Confidential Statement of Formula for additional information on the composition of Turfthor WP.
- ⁵ **830.6316** - This product does not have explosive characteristics; therefore these data are not required. Please refer to the Confidential Statement of Formula for additional information on the composition of Turfthor WP.
- ⁶ **830.6317, 830.6320** - Ensystex III, Inc. is currently conducting storage stability and corrosion characteristic studies to satisfy guidelines 830.6317 and 830.6320, respectively. Per PR Notice 92-5, storage stability data are not required to be submitted unless specifically requested by the Agency. OPPTS 830.6317 and 830.6320 guidelines allow the corrosion characteristics study and storage stability study to be conducted simultaneously. Ensystex III, Inc. will submit these data upon completion. As these studies take over a year to complete, Ensystex III, Inc. requests that a conditional registration for Turfthor WP be granted on the submission of these data.
- ⁷ **830.6319** - Turfthor WP is a wettable powder formulation and not an emulsifiable concentrate. In addition, the proposed label recommends dilution of Turfthor WP with water, not oil; therefore, these data are not applicable nor are these data required.
- ⁸ **830.6321** - This product is not proposed for use around electrical equipment. Therefore, these data are not applicable nor are these required.
- ⁹ **830.7100** - This product is a solid; therefore these data are not applicable nor are these data required.
- ¹⁰ **71-1(a)** - Study classified as core as per a February 24, 1992 memorandum and a March 27, 1992 data evaluation review (Refer to Attachments 1 and 2, respectively of 82957-R).
- ¹¹ **71-2(a)** - Study classified as core as per a February 24, 1992 memorandum and a March 27, 1992 data evaluation review (Refer to Attachments 1 and 3, respectively of 82957-R).
- ¹² **71-2(b)** - Study classified as core as per a February 24, 1992 memorandum and a March 27, 1992 data evaluation review (Refer to Attachments 1 and 4, respectively of 82957-R).
- ¹³ **71-3** - Data are not required as no data have been submitted in response to this guideline requirement. Please refer to the toxicity section. Furthermore, 40 CFR Part 158 states that these data are only required based on the results of lower tier studies, intended use pattern, and pertinent environmental fate characteristics. Because the lower tier studies did not trigger additional testing (practically nontoxic to moderately toxic), these data are not required.
- ¹⁴ **71-4(b)** - According to a February 16, 1995 EPA memorandum, the submissions cited satisfy the data requirement (Refer to Attachment 5 of 82957-R).
- ¹⁵ **71-2(c)(d)** - Study classified as core as per a February 24, 1992 memorandum and a March 27, 1992 data evaluation review (Refer to Attachments 1 and 6, respectively of 82957-R).
- ¹⁶ **72-2(a)(b)** - Study classified as core as per a February 24, 1992 memorandum and a March 27, 1992 data evaluation review (Refer to Attachments 1 and 7, respectively of 82957-R).
- ¹⁷ **72-4(a)** - These data are not required for the proposed limited use pattern for the following reasons:

Endnotes for Data Matrix for Turfthor WP

- Data are not summarized in the decision memorandum for the registration of imidacloprid dated March 10, 1994 (Refer to Attachment 8 of 82957-R). This memo summarized ecological effects data that supported the non-food registration of imidacloprid.
- 40 CFR Part 158 states that these data are required if the product is applied directly to water or expected to be transported to water from the intended use site and when one of several other conditions apply. Turfthor WP is not proposed for application directly to water and its terrestrial outdoor applications are limited and transport to water is not expected. Furthermore, based on a review of toxicity data (see Attachments 6 and 7 of 82957-R), imidacloprid technical is practically non-toxic to slightly toxic to aquatic species.

¹⁸ **72-4(b)** - These data are not required for the proposed limited use pattern for the following reasons:

- Data are not summarized in the decision memorandum for the registration of imidacloprid dated March 10, 1994 (see Attachment 8 of 82957-R). This memo summarized ecological effects data that supported the non-food registration of imidacloprid.
- 40 CFR Part 158 states that these data are required if the product is applied directly to water or expected to be transported to water from the intended use site and when one of several other conditions apply. Turfthor WP is not proposed for application directly to water and its terrestrial outdoor applications are limited and transport to water is not expected. Furthermore, based on a review of toxicity data (see Attachments 6 and 7 of 82957-R), imidacloprid technical is practically non-toxic to slightly toxic to aquatic species.

¹⁹ **72-5** - These data are not required for the proposed limited use pattern for the following reasons:

- Data are not summarized in the decision memorandum for the registration of imidacloprid dated March 10, 1994 (see Attachment 8 of 82957-R). This memo summarized ecological effects data that supported the non-food registration of imidacloprid.
- 40 CFR Part 158 states that these data are required if the product is applied directly to water or expected to be transported to water from the intended use site and when one of several other conditions apply. Turfthor WP is not proposed for application directly to water and its terrestrial outdoor applications are limited and transport to water is not expected. Furthermore, based on a review of toxicity data (see Attachments 6 and 7 of 82957-R), imidacloprid technical is practically non-toxic or slightly toxic to aquatic species.

²⁰ **870.3050** - Chronic toxicity data cited to satisfy this data requirement (see 870.4200).

²¹ **870.3100** - Chronic toxicity data cited to satisfy this data requirement (see 870.4200). Furthermore, subchronic toxicity data are not summarized in the decision memorandum for the registration of imidacloprid dated March 10, 1994 (Refer to Attachment 8 of 82957-R).

²² **870.3150** - Chronic toxicity data cited to satisfy this data requirement (see 870.4100). Furthermore, subchronic toxicity data are not summarized in the decision memorandum for the registration of imidacloprid dated March 10, 1994 (see Attachment 8 of 82957-R).

²³ **870.3250** - Data are not required as per a September 3, 1993 EPA memorandum (Refer to Attachment 11 of 82957-R).

²⁴ **870.3465** - Although a submitted study was classified as acceptable, a September 3, 1993 EPA memorandum states that these data are not required to support the registration (see Attachment 11 of 82957-R).

²⁵ **870.3800** - According to 40 CFR Part 156, these data are only required for food uses or products intended for non-food uses if the use is likely to result in human exposure over a portion of the human life span which is significant in terms of the frequency of the exposure, such as treated fabrics, diapers, or bedding; insect repellents applied directly to human skin; swimming pool additives; constant-release indoor pesticides. Turfthor WP is not proposed for use in or on food nor is its proposed uses likely to result in human exposure over a significant portion of the life span. Therefore, these data are not required to support the registration of Turfthor WP.

Endnotes for Data Matrix for Turfthor WP

- ²⁶ **870.5100** - As per a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R), these studies satisfy the guideline requirement.
- ²⁷ **870.5300** - As per a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R), these studies satisfy the guideline requirement.
- ²⁸ **870.5375** - As per a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R), these studies satisfy the guideline requirement.
- ²⁹ **870.5385** - As per a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R), this study satisfies the guideline requirement.
- ³⁰ **870.5395** - As per a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R), this study satisfies the guideline requirement.
- ³¹ **870.5500** - As per a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R), this study satisfies the guideline requirement.
- ³² **870.5550** - As per a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R), these studies satisfy the guideline requirement.
- ³³ **870.5900** - As per a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R), this study satisfies the guideline requirement.
- ³⁴ **870.5915** - As per a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R), this study satisfies the guideline requirement.
- ³⁵ **870.6100** - Product is not an organophosphorus substance; therefore, these data are not required.
- ³⁶ **870.6200** - According to a September 3, 1993 EPA memorandum (see Attachment 11 of 82957-R) (note: this memo pertains to food uses) and as reiterated in a June 8, 1994 EPA memorandum (see Attachment 12 of 82957-R) (note: memo also pertains to food uses), neurotoxicity data are not required because there was no evidence of neurotoxicity observed in acute or chronic exposure.
- ³⁷ **870.6300** - According to a September 3, 1993 EPA memorandum (Refer to Attachment 11 of 82957-R) (note: this memo pertains to food uses) and as reiterated in a June 8, 1994 EPA memorandum (see Attachment 12 of 82957-R) (note: memo also pertains to food uses), neurotoxicity data are not required because there was no evidence of neurotoxicity observed in acute or chronic exposure.
- ³⁸ **870.7200** - Turfthor WP is not proposed for use on domestic animals; therefore, these data are not required.
- ³⁹ **870.7485** - Turfthor WP is not proposed for use on food. Furthermore, metabolism data are not summarized in the decision memorandum for the registration of imidacloprid dated March 10, 1994 (see Attachment 8 of 82957-R).
- ⁴⁰ **870.7600** - Imidacloprid does not have a serious toxic effect as identified by oral or inhalation studies; therefore these data are not required (see 40 CFR Part 158).
- ⁴¹ **122-1(a)** - Seed germination and seedling emergence data were not summarized in the decision memorandum for the registration of imidacloprid dated March 10, 1994 (see Attachment 8 of 82957-R). In addition, no acceptable seed germination and seedling emergence data are identified in the ecotoxicity one-liners (Refer to Attachment 13 of 82957-R).
- ⁴² **122-1(b)** - Vegetative vigor data were not summarized in the decision memorandum for the registration of imidacloprid dated March 10, 1994 (see Attachment 8 of 82957-R). In addition, no acceptable vegetative vigor data are identified in the ecotoxicity one-liners (see Attachment 13 of 82957-R).
- ⁴³ **122-2** - Aquatic plant growth data were not summarized in the decision memorandum for the registration of imidacloprid dated March 10, 1994 (see Attachment 8 of 82957-R). In addition, no acceptable aquatic plant growth data are identified in the ecotoxicity one-liners (Refer to Attachment 13 of 82957-R).

Endnotes for Data Matrix for Turfthor WP

- ⁴⁴ **132-1(a)** – As per a November 14, 1996 EPA review (see Attachment 14 of 82957-R), this study satisfies the guideline requirement.
- ⁴⁵ **133-3** – As per a November 14, 1996 EPA review (see Attachment 14 of 82957-R), this study satisfies the guideline requirement.
- ⁴⁶ **133-4** – As per a November 14, 1996 EPA review (see Attachment 14 of 82957-R), this study satisfies the guideline requirement.
- ⁴⁷ **141-1** – As per a December 22, 1992 EPA review (Refer to Attachment 15 of 82957-R), this study satisfies the guideline requirement.
- ⁴⁸ **162-1** – As per a April 18, 1993 EPA memorandum (see Attachment 16 of 82957-R), this study satisfies the guideline requirement.
- ⁴⁹ **162-3** – In an April 18, 1993 EPA memorandum (Attachment 16), although a study was submitted and considered acceptable, it was noted that these data are not required for a terrestrial non-food registration.
- ⁵⁰ **162-4** – Turfthor WP is not proposed for use in or on aquatic use sites; therefore, according to 40 CFR Part 158, these data are not required.
- ⁵¹ **163-1** – In an April 18, 1993 EPA memorandum (see Attachment 16 of 82957-R), the studies cited were classified as acceptable and satisfy the data requirement.
- ⁵² **164-1** – An April 18, 1993 EPA memorandum (see Attachment 16 of 82957-R) classifies all of the submitted field dissipation studies as supplemental. In addition, there did not appear to be an acceptable study submitted to satisfy this data requirement. In particular, a March 10, 1994 EPA registration decision memorandum (see Attachment 8 of 82957-R) states that field dissipation data are ambiguous and required a ground water advisory statement be placed on the label as well as the submission of an analytical method for the determination of imidacloprid in soil (see 166-1). Therefore, Ensystem III has concluded that data are not required to be cited for the registration of Turfthor WP.
- ⁵³ **164-2** – Turfthor WP is not proposed for use in or on aquatic use sites; therefore, according to 40 CFR Part 158, these data are not required.
- ⁵⁴ **164-3** – Turfthor WP is not proposed for use in or on forestry sites; therefore, according to 40 CFR Part 158, these data are not required.
- ⁵⁵ **164-5** – As per an EPA registration decision memorandum of March 10, 1994 (see Attachment 8 of 82957-R), long term field dissipation data were not required.
- ⁵⁶ **165-1** – Turfthor WP is not proposed for use in or on food; therefore, according to 40 CFR Part 158, these data are not required.
- ⁵⁷ **165-3** – Turfthor WP is not proposed for use in or on food or aquatic use sites; therefore, according to 40 CFR Part 158, these data are not required.
- ⁵⁸ **165-4** – This data requirement is waived as per an April 18, 1993 EPA memorandum (Refer to Attachment 16 of 82957-R).
- ⁵⁹ **166-1** – Data requirement reserved as per an April 18, 1993 EPA memorandum (see Attachment 16 of 82957-R) and March 10, 1994 EPA memorandum (see Attachment 8 of 82957-R). The March 10, 1994 memorandum required the submission of an analytical method for the determination in water; it is presumed that the study cited satisfies this data requirement.
- ⁶⁰ **166-1** – Data requirement reserved as per an April 18, 1993 EPA memorandum (see Attachment 16 of 82957-R) and March 10, 1994 EPA memorandum (see Attachment 8 of 82957-R).
- ⁶¹ **860 series** – Residue chemistry data are not required for the registration of Turfthor WP because it is not proposed for use in or on food.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01.30.05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7005 1820 0004 3491 0712

Syngenta Crop Protection, Inc.
Attn: Regulatory Affairs
P.O. Box 18300
Greensboro, NC 27419

RE: Notice of Intent to Apply for Registration

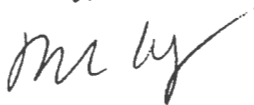
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Syngenta Crop Protection, Inc. is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01-30-05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7005 1820 0004 3491 0729

Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

RE: Notice of Intent to Apply for Registration

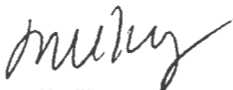
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Bayer CropScience LP is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01-30-05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7005 1820 0004 3491 0736

Bayer Environmental Science
A Business Group of Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

RE: Notice of Intent to Apply for Registration

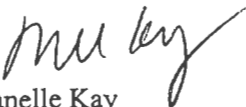
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Bayer Environmental Science is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01-30-05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3491 0798

Lanxess Corporation
111 RIDC Park West Drive
Pittsburgh, PA 15275

RE: Notice of Intent to Apply for Registration

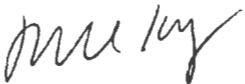
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Lanxess Corporation is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01-30-05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7005 1820 0004 3491 0781

Landis International, Inc.
Agent For: Mitsui Chemicals America, Inc.
P.O. Box 5126
Valdosta, GA 31603

RE: Notice of Intent to Apply for Registration

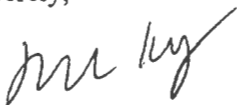
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Landis International, Inc. (Agent for Mitsui Chemicals America, Inc.) is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01-30-05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3491 0750

Gustafson LLC
P.O. Box 660065
Dallas, TX 75266

RE: Notice of Intent to Apply for Registration

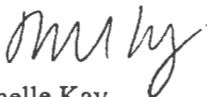
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Gustafson LLC is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01-30-05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3491 0743

Bayer Corp.
P.O. Box 4913
Kansas City, MO 64120-0013

RE: Notice of Intent to Apply for Registration

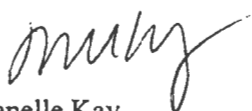
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Bayer Corp. is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01.30.05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7005 1820 0004 3491 0835

Bayer Advanced
A Business Unit of Bayer CropScience LP
2 T.W. Alexander Drive
Research Triangle Park, NC 27709

RE: Notice of Intent to Apply for Registration

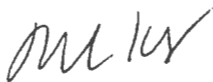
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Bayer Advanced is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,

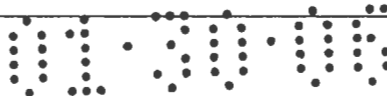


Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com



December 1, 2005



VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3491 0828

Rogosheske Consulting
Agent for: Pet Logic, LLC
1479 W. Pond Rd
Eagan, MN 55122

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Ensysstex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Rogosheske Consulting (Agent for Pet Logic, LLC) is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensysstex III, Inc.'s registration, Ensysstex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,

Janelle Kay
Agent for Ensysstex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01.30.05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3491 0811

Regwest Company, LLC
Agent for: Arbor Systems, LLC
30856 Rocky Road
Greeley, CO 80631

RE: Notice of Intent to Apply for Registration

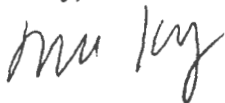
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Regwest Company, LLC (Agent for Arbor Systems, LLC) is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01.30.05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3490 9785

Arch Treatment Technologies, Inc.
1955 Lake Park Drive
Smyrna, GA 30080

RE: Notice of Intent to Apply for Registration

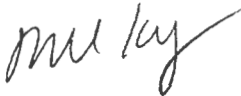
Dear Sir/Madam:

Ensystem III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Arch Treatment Technologies, Inc. is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystem III, Inc.'s registration, Ensystem III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,

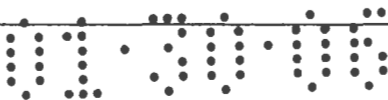


Janelle Kay
Agent for Ensystem III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com



December 1, 2005



VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3490 9792

Spray Drift Task Force
c/o McKenna Long & Aldridge, LLP
1900 K Street NW
Washington, DC 20006

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, the SDTF is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,

Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01.30.05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3491 0705

Agricultural Handler Exposure Task Force
1156 Fifteenth Street, NW
Suite 400
Washington, DC 20005

RE: Notice of Intent to Apply for Registration

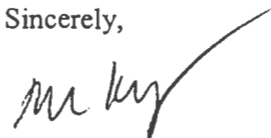
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, the AHETF is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

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Fax: 253-853-5516
www.PyxisRC.com

01.30.05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3490 9815

Agricultural Reentry Task Force
c/o Beveridge & Diamond, P.C.
1350 I Street NW
Washington, DC 20005

RE: Notice of Intent to Apply for Registration

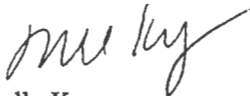
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, the ARTF is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01.30.05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3490 9808

Outdoor Residential Exposure Task Force, LLC
c/o Beveridge & Diamond, P.C.
1350 I Street NW
Washington, DC 20005

RE: Notice of Intent to Apply for Registration

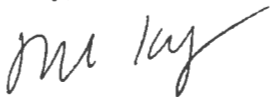
Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, the ORETF is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,



Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

Phone: 253-853-7369
Fax: 253-853-5516
www.PyxisRC.com

01-30-05

December 1, 2005

EPA

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3490 9761

Regulatory Services Inc.
Agent for: Taranaki Nuchem Ltd.
17220 Westview Rd.
Lake Oswego, OR 97034

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Regulatory Services Inc. (Agent for Taranaki Nuchem Ltd.) is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,

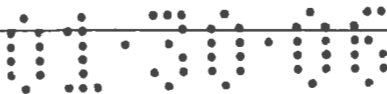


Janelle Kay
Agent for Ensystex III, Inc.

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Gig Harbor, WA 98332

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December 1, 2005



VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3491 0804

Mycogen Seeds
c/o Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Mycogen Seeds is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,

Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

4110 136th St. NW
Gig Harbor, WA 98332

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Fax: 253-853-5516
www.PyxisRC.com



December 1, 2005



VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7005 1820 0004 3491 0774

Bayer Healthcare LLC
Animal Health Division
P.O. Box 390
Shawnee Mission, KS 66201

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turfthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Bayer Healthcare LLC is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,

Janelle Kay
Agent for Ensystex III, Inc.

PYXIS REGULATORY CONSULTING, INC.

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Gig Harbor, WA 98332

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December 1, 2005



VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

7005 1820 0004 3491 0767

Chemical Specialties Inc.
One Woodlawn Green, Suite 250
Charlotte, NC 28217

RE: Notice of Intent to Apply for Registration

Dear Sir/Madam:

Ensystex III, Inc. hereby provides notice of its intent to apply for registration of a technical product and two end-use products containing imidacloprid as the active ingredient. The proposed product names are "ENS-010", "Prothor WP" and "Turthor WP" respectively.

In EPA's September 30, 2005 Listing of Pesticide Data Submitters, Chemical Specialties Inc. is included as one of the entities that has submitted data to the Agency pertaining to imidacloprid. This letter is not an offer to pay compensation under FIFRA § 3(c)(1)(F) or FIFRA § 3(c)(2)(B). As directed by EPA, prior to EPA's approval of Ensystex III, Inc.'s registration, Ensystex III, Inc. will provide the appropriate party(ies) an offer to pay compensation to the extent required by FIFRA § 3(c)(1)(F).

Thank you for your cooperation.

Sincerely,

Janelle Kay
Agent for Ensystex III, Inc.

ENSYSTEX III, Inc.

2709 Breezewood Ave., P. O. Box 2587, Fayetteville, NC 28302-2587 USA
Telephone - 1-910-484-6163 x 203 Fax - 1-910-484-3378 Email david@ensystex.com

November 2, 2005

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as agent for Ensytex III, Inc. (EPA Company Number pending), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act ("FIFRA"), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,



David Nimocks
Chairman

cc: Pyxis Regulatory Consulting, Inc.

Notary

